

1 ROGER L. GRANDGENETT II, ESQ., Bar # 6323  
2 MATTHEW T. CECIL, ESQ., Bar # 9525  
3 LITTLER MENDELSON, P.C.  
3960 Howard Hughes Parkway  
Suite 300  
Las Vegas, NV 89169-5937  
4 Telephone: 702.862.8800  
Fax No.: 702.862.8811  
5 Email: rgrandgenett@littler.com  
Email: mcecil@littler.com

6 Attorneys for Defendant  
7 Wal-Mart Stores, Inc.

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10  
11 KEVIN ZIMMERMAN, an individual,  
12 Plaintiff,  
13 vs.  
14 WAL-MART STORES, INC.,  
15 Defendant.

Case No. 2:17-cv-00435-GMN-GWF

**STIPULATION AND  
ORDER TO EXTEND TIME FOR  
DEFENDANT TO FILE A RESPONSE TO  
THE COMPLAINT  
[THIRD REQUEST]**

16  
17 Plaintiff KEVIN ZIMMERMAN (hereinafter "Plaintiff") and Defendant WAL-MART  
18 STORES, INC., (hereinafter, "Defendant") by and through their undersigned counsel, hereby agree  
19 and stipulate to extend the time for Defendant to file a response to the Plaintiff's Complaint from the  
20 current deadline of June 16, 2017 up to and including **July 17, 2017**.

21 The parties' counsel met on June 9, 2017 and reached a settlement, the general terms of  
22 which have since been confirmed in an email. Currently, Defendant is preparing the formal  
23 settlement agreement for Plaintiff's review and execution. At this time, a response to the complaint  
24 is unnecessary because this matter will be dismissed after the settlement is executed. Accordingly,  
25 the parties request that this stipulation be granted.

26 The parties believe the settlement will be finalized in the next two weeks, but have requested  
27 this 30 day extension out of an abundance of caution to ensure sufficient time to resolve any  
28 potential wording issues with the settlement agreement.

1 This is the third request for an extension of time to respond to the Complaint. This request is  
2 made in good faith and not for the purpose of delay.

3  
4 Dated: June 16, 2017

Dated: June 16, 2017

5 Respectfully submitted,

Respectfully submitted,

6  
7 /s/ Whitney C. Wilcher

8 WHITNEY C. WILCHER, ESQ.  
THE WILCHER FIRM

9 Attorney for Plaintiff  
KEVIN ZIMMERMAN

/s/ Matthew T. Cecil

10 ROGER L. GRANDGENETT II, ESQ.  
MATTHEW T. CECIL, ESQ.  
LITTLER MENDELSON, P.C.

11 Attorneys for Defendant  
WAL-MART STORES, INC.

12 **ORDER**

13 **IT IS SO ORDERED.**

14 Dated: June 19, 2017.

15  
16 

17 UNITED STATES MAGISTRATE JUDGE

18  
19  
20 Firmwide:148272365.1 999999.6420